

## Greg Leonard

52350 East 200 Road  
Afton, Oklahoma 74331  
January 30, 2006

Mr. Kenneth R. Payne  
Chief, Marketing Programs, Livestock and Seed Program  
U.S. Department of Agriculture  
Agriculture Marketing Service  
Room 2638-S, Stop 0251  
Washington, D.C. 200250-0251

Dear Mr. Payne,

As a check off paying soybean farmer I want to thank you for this opportunity to comment on the soybean check off program. It is good that someone is willing to listen to the check off paying farmers as it seems that the directors of the nation check off program do not think that they are responsible to the farmers who pay the money into the check off.

I believe that the nation soybean check off has been effective in the areas of promotion and research but that the national soybean check off could be more effective with some structural changes that would make it more accountable to the farmers that pay in to the check off.

At the national check off level I have great concern about accountability. The national check off board of directors are appointed to the United Soybean Board by the Secretary of Agriculture, and not elected by the farmers that pay the money into the check off. This should be changed even if educational requirements are required to be elected a director. Some of USB directors have made it very clear to me personally that they have no obligation to justify their actions and deeds to the farmers at home, since the Secretary of Agriculture appointed them. Their main concerns are if their actions are deemed legal and meet AMS approval. I have been assured that this was not the intent of the national check off by leaders of the American Soybean Association that lobbied to create the national soybean check off in 1990.

I still have not gotten any answers from USB as to how the recent formation of the Soybean Export Council is a cost benefit to the check off paying soybean farmer of the United States. They have spent untold dollars of check off and association money in legal fees and meeting expenses to develop a new entity that has gained us what over the former American Soybean Association managed contract that was operated at a cost only contract while being used as a model by FSA in producer marketing of USA commodities. When the farmer directors of USB tell farmers back in their states that they don't have to answer these questions it makes it hard for the average farmer to have faith in this system! It has been amazing to me at the Commodity Classic the past few years how the private contractors can afford to throw large reception parties for the check off board members and guest while still being more cost effective than producer groups that aren't allowed to make profit from contracting with the United Soybean Board.

This brings up another point of concern. The national check off is mandatory. Farmers are not given the option of asking for refunds, and for this reason, there should be accountability back to the local level. It is not fair every soybean farmer pays check off dollars, but then has no input as to how those dollars are spent.

The current vote for a request for referendum is confusing to most check off paying farmers. It should be replaced with a simple yes to continue or no to end the check off vote. This vote should be held at least once every five years but preferable once every three years. The vote should take place in the winter months of the year so that the check off paying farmer doesn't have to leave the fields to vote during planting or harvesting times like the last vote which was held during May. Little things like this sends a message to the

check off paying farmers that USDA and the national check off are operating fairly under the rules wanting a fair elections not one where no will vote. I also have concerns about how the number of eligible farmers are calculated by USDA. This in effects determines how the current request for referendum would turn out. It seems to me that only farmers who pay check off should be eligible to vote. This should be a thing that the check off can provide as someone has to have records of who pays in to the check off. Under the current system it is going to be nearly impossible to ever have the opportunity to actually have a up or down vote on the national check off due to the large numbers from USDA.

Soybeans are a very important part of the viability and financial stability of not only my farm, and several thousand other soybean farms , but to the economies of the local communities, states, and nation as a whole. It is imperative that the U.S. soybeans and soybean products thrives in the future.

The structural changes I have discussed and recommended will help maintain that thriving soybean economy into the future for soybean farmer and the entire soybean industry. I supported the National Soybean Check Off when I worked hard to help created it and I hope that with the help of USDA we as local soybean farmers can help to create the accountability that is needed now to create the local grassroots trust and support that the National Soybean Check Off needs so badly in order for it to lead us and help keep us competitive in this global market..

If I can be of any further assistance or service please let me know.

Sincerely,

Greg Leonard